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POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

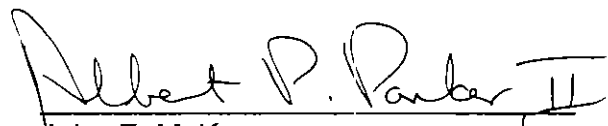
DOCKET NO. R97-1

**EIGHTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE
(UPS/USPS-36 through UPS/USPS-40)**

September 17, 1997

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness (UPS/USPS-36 through UPS/USPS-40).

Respectfully submitted,



John E. McKeever
Albert P. Parker, II
Stephanie Richman
Attorneys for United Parcel Service

SCHNADER HARRISON SEGAL & LEWIS LLP
1600 Market Street, Suite 3600
Philadelphia, Pennsylvania 19103-7286
(215) 751-2200

and

1913 Eye Street, N.W., Suite 600
Washington, D.C. 20006-2106
(202) 463-2900

Of Counsel.

**EIGHTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE**

UPS/USPS-36. With reference to the Postal Service's response to

Presiding Officer's Information Request No. 1.a.(1), please provide the following:

- (a) an explanation of how the average cost per cubic foot mile was calculated.
- (b) all supporting data, or reference in the record to supporting data sufficient to replicate those calculations.
- (c) confirmation that the average cost per cubic foot mile is the cost per cubic foot mile of capacity instead of the cost per cubic foot mile of actual volume transported. Please describe any non-confirmation.
- (d) confirmation that the Intra-Alaska linehaul Air Rates are costs per ton mile of actual mail volume transported instead of the cost per ton mile of capacity. Please explain any non-confirmation.

UPS/USPS-37. Please refer to the Revenue, Pieces, and Weight (RPW)

Reporting System and other systems as appropriate. Provide the Government FY1996 mail volume drop shipped by mailers at postal facilities for:

- (a) each class of mail; and
- (b) subclass and rate category.
- (c) Identify the data subsystems used to identify the drop shipped volumes for each class and subclass in (a) and (b) above.

UPS/USPS-38. Please refer to the Revenue, Pieces and Weight (RPW)

Reporting System and other systems as appropriate. Provide the Third Class

Government Fiscal Year 1996 volumes, dropshipped at each BMC and ASF and SCF.

UPS/USPS-39. Please identify and describe mail volume information available for each class and subclass of mail for Government FY1996.

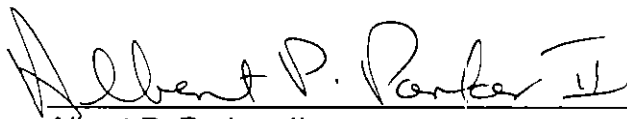
- (a) mail destinating in an SCF service area; and
- (b) mail originating in SCF service area.

UPS/USPS-40. Please provide Government FY1996 mail volume by class for each SCF for each category below for:

- (a) mail destinating in each SCF service area; and
- (b) mail originating in each service area.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.


Albert P. Parker, II

Dated: September 17, 1997
Philadelphia, PA